



DAVID G. HOSENPUD
503.778.2141
hosenpudd@lanepowell.com

March 1, 2022

By ECF

The Honorable Louis L. Stanton
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *Frontier Airlines v. AMCK Aviation, et al.*, No. 20 Civ. 09713 (LLS) (S.D.N.Y.)

Dear Judge Stanton:

The parties in the above-captioned matter jointly request that the Court approve a 21-day extension to the fact discovery cutoff, from March 25, 2022, to April 15, 2022. This is the parties' first request to extend the fact discovery cutoff. The proposed extension will not affect any other deadlines or proceedings scheduled by the Court.

The parties have worked cooperatively to arrange depositions. In light of the current deponents' schedules, however, the agreed upon depositions cannot occur until after the March 25, 2022, cutoff. To accommodate these depositions, the parties respectfully request an extension of the fact discovery cutoff to April 15, 2022.

Respectfully submitted,

LANE POWELL PC

s/David G. Hosenpud

David G. Hosenpud (*pro hac vice*)
Aaron Schaer (*pro hac vice*)

-and-

BINDER & SCHWARTZ LLP
Neil S. Binder

Attorneys for Frontier Airlines

CLIFFORD CHANCE US LLP

s/Jeff E. Butler

Jeff E. Butler
John P. Alexander

Attorneys for Defendants

022510.0155/8894686.3